



REORGANIZATION DECISION MEMORANDUM

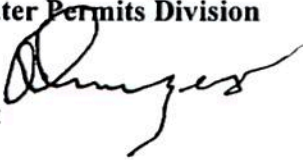
*The decision memorandum must be completed, signed by the Assistant Administrator/ Regional Administrator, submitted to Troy Bixton, Office of Human Resources, Policy, Planning and Training Division and the designated HR Shared Service Center Representative via **email and hardcopy** for review. If there are questions regarding this form, please refer to the agency's reorganization website for additional information at:
<http://intranet.epa.gov/ohr/programs/reorg/steps.htm>*

NOTE: Signing of this memorandum prior to stakeholder reviews does not confirm that the AA/RA agrees to any comments received pending final stakeholder comments.

MEMORANDUM

DATE: September 27, 2017

SUBJECT: REORGANIZATION DECISION MEMORANDUM – Office of Water, Office of Wastewater Management, Water Permits Division

FROM: Andrew Sawyers, Office Director
Office of Wastewater Management 

TO: Michael Shapiro, Acting Assistant Administrator
Office of Water

This memorandum requests your approval of the proposed reorganization of the Office of Water, Office of Wastewater Management, Water Permits Division (WPD). Once the attached reorganization package is approved, it will be sent to the Office of Human Resources to begin the Agency review process. It is anticipated that the review will take 90 days or less.

NEED

WPDs current organizational structure is designed around NPDES program needs that have evolved over the past 20 years. The proposed reorganization is a response to significant changes in the direction, scope and complexity of the NPDES program administered by the Water Permits Division. The first of these changes is the more than doubling of the size of the NPDES program due to full implementation of the stormwater program and a significant expansion of the scope of the program following a series of adverse court decisions. The second change is the increasing technical complexity of the program as water quality standards and Total Maximum Daily Loads (TMDLs) are fully integrated into NPDES permits. The final change is the

increasingly complex legal and economic environment in which the program operates. A wide range of industrial sectors, environmental and citizen groups are increasingly interested in the decisions made by both EPA and the authorized NPDES.

PROPOSAL

The proposed reorganization:

- 1) Renames the State and Regional Branch as the National Program Branch.
- 2) Eliminates one branch – the Rural Branch.
- 3) Restructures the Industrial Branch to incorporate all industrial sector programs into a single branch.

REVIEW AND ANALYSIS

Management has engaged and consulted with the Office of Human Resources and the Shared Service Center in development of this reorganization package. Both impacted unions (AFGE, NTEU) have been invited to participate in all discussions with staff and have received all materials distributed to staff. WPD staff have been kept up to date through All Hands meetings, emails, and updates at regular branch meetings. We are planning to communicate with the Regions, Federal Partners and program offices and grantees.

The WPD reorganization eliminates one branch – the Rural Branch – and restructures the function of an existing branch – the Industrial Branch. The Industrial Branch will incorporate all of the industrial sector programs into one organization, thereby promoting efficient operations.

The WPD reorganization eliminates one supervisory Associate Division Director position, one Supervisory Branch Chief position and one Supervisory Associate Branch Chief position. The staff to supervisor ratio changes from 7:49 (1:8) to 4:49 (1:12).

The WPD reorganization will allow the OWM to better align CWA programs, collaborate with partners and find efficiencies in managing and delivering an evolving highly complex regulatory program.

RECOMMENDATION

I have received notice from the Office of Administration and Resources Management's Office of Human Resources that all comments have been satisfactorily resolved and the proposal is ready for approval.

Approved:

Michael Shapiro
Michael Shapiro, Acting Assistant Administrator, Office of Water

Date:

10/17/17

Attachment:

Tab A: Reorganization Proposal Form



REORGANIZATION PROPOSAL

The Reorganization Proposal form must be completed, signed by your Assistant Administrator/Regional Administrator, and submitted to Troy Bixton, OARM, Office of Human Resources, Policy, Planning and Training Division and to your designated HR Shared Service Center Representative via email for review. Please complete this form in its entirety and submit with all required documents and approvals; forms are available at http://intranet.epa.gov/ohr/programs/reorg_start.htm. If you have any questions regarding completion of this form, please see page 2 for Troy's contact information.

A. CONCISE STATEMENT OF CHANGE

1. **Provide an executive summary that succinctly explains the proposed change(s) (one paragraph or less)** – The Water Permits Division is reorganizing from 4 branches to 3, and eliminating 3 supervisory positions to establish a more efficient organizational structure aligned with current NPDES programs.
2. **Describe the title(s) of the unit(s) affected** –
The Water Permits Division:
 - Immediate Office
 - Municipal Branch
 - Rural Branch (eliminated)
 - State and Regional Branch (renamed the National Program Branch)
 - Industrial Branch
3. **Explain the change purpose (e.g., whether the change is due to a new legislative authority, new program authority or shifts in program emphasis)** – The current organizational structure is designed around NPDES program needs that have evolved over the past 20 years. The reorganization establishes a more efficient organization designed to address:
 - (1) A more than doubling in size of the NPDES program due to full implementation of the stormwater program and a significant expansion in scope following a series of adverse court decisions.
 - (2) The increasing technical complexity of the program as water quality standards are fully integrated into NPDES permits.
 - (3) The increasingly complex legal and economic environment in which the program operates.
4. **Discuss the progress to date based on communications with level approvers and discussions with stakeholders, unions, SSCs, etc.** – Management has engaged and consulted with OW management, OHR and the SSC-TV. Both impacted unions (AFGE and NTEU) have been invited to participate in discussions and have received all materials distributed to staff. Division staff have been kept up to date through all hands meetings, emails and updates at regular branch meetings.
5. **Describe the benefits of this change(s) to the agency (e.g., increased accountability, enhanced communication and coordination, improved efficiency)** – The reorganization establishes a more efficient structure, better aligns with current NPDES program needs, enhances collaboration across the program, and establishes technical positions necessary to operate a complex national permitting program.



REORGANIZATION PROPOSAL

6. Is there an impact between AA/RA offices, between offices within an AA office or between Regional divisions? No

B. ANALYSIS OF IMPACT ON PERSONNEL

1. Will there be an impact on the supervisor-to-staff ratio at the AAship/RAship level?
☐ No ☒ Yes

If yes, please explain and include your present AAship/RAship supervisor-to-staff ratio and the proposed AAship/RAship supervisor-to-staff ratio. The Division supervisor-to-staff ratio will go from 1:8 (current) to 1:12 (proposed). The impact at the Office of Water level is minimal.

2. Will this proposed reorganization: (a) Eliminate positions; (b) Cause a reduction in force; (c) Change how positions are graded; (d) Add new functional units; or (e) Support a VERA/VSIP? ☐ No ☒ Yes

If yes, please explain. The reorganization: (1) eliminates one Supervisory Branch Chief position, one Supervisory Associate Branch Chief position, and reclassifies the Associate Division Director as a non-supervisory position; (2) eliminates one branch – the Rural Branch and incorporates all industrial sector programs in the existing Industrial Branch.

3. Will there be an impact on the diversity of the organization? ☒ No ☐ Yes
If yes, please explain.

C. ADMINISTRATIVE ISSUES *(Failure to address all administrative issues may result in a delay in the implementation of the reorganization.)*

1. Will there be any physical moves of staff? ☒ No ☐ Yes
If yes, please explain.

2. Will new space be required? ☒ No ☐ Yes
If so, have all technical (computer, telecommunications, etc.) needs been assessed?

3. Will the reorganization require new information systems/technologies, or significant changes to existing ones, and (if so) has it been acquired? ☒ No ☐ Yes
If yes, please explain.

4. Will there be any budgetary impacts? If yes, please explain in detail. ☒ No ☐ Yes

D. EPA DIRECTIVES



REORGANIZATION PROPOSAL

1. Will any Delegations of Authority, Orders or Manuals be affected? ☒ X No ☐ Yes
If yes, please explain and attach the directive affected.


E. ATTACHMENTS *(Use the forms provided)*

1. Staffing Plan Crosswalk *(Use Staffing Plan Template)*. Contact your servicing HR SSC for information *(Do not include social security numbers)*.
2. Current Organizational Chart.
3. Proposed Organizational Chart *(Must include all organization levels)*.
4. Current Functional Statement.
5. Proposed Functional Statement *(Must include all reporting levels)*.

Assistant Administrator/Regional Administrator Approval

Name: Michael Shapiro

Title: ^{SA} Acting Assistant Administrator, OW


Signature: 

Date: 10/17/17

Human Resources Office/Program Management Office Reviewed

Name: Alfredo Torrez

Title: Associate Director, PMO, OW

Signature: 

Date: 10/17/17

Human Resources Shared Service Center Approval *(Certifies Receipt of this Package)*

Name: Lizabeth Engebretson

Title: Director, SSC, Team Vegas

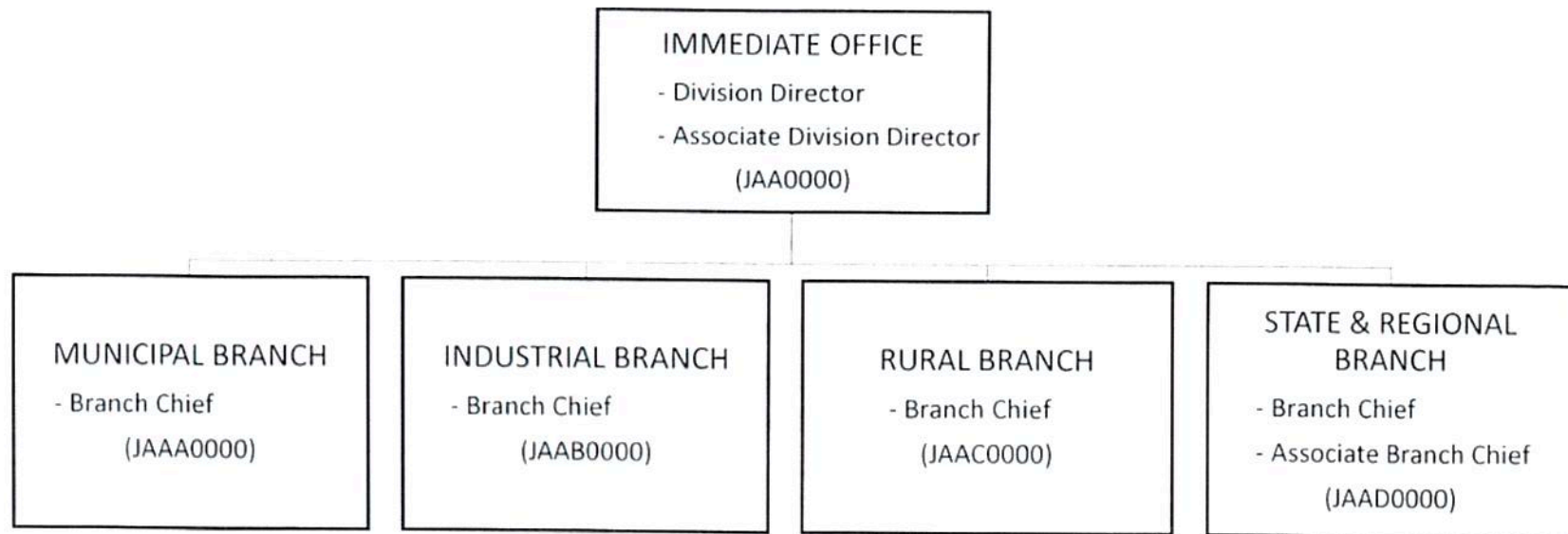
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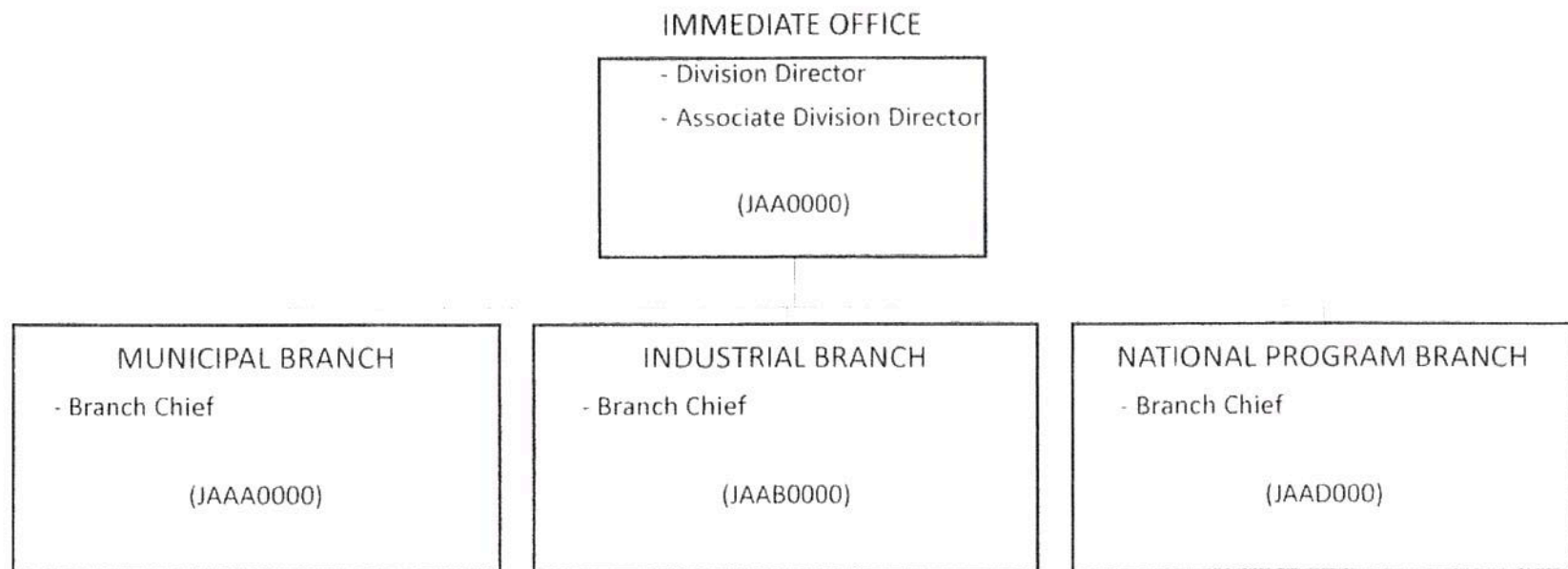
Contact Information:

Troy Boxton, Management Analyst
Office of Administration and Resources Management
Office of Human Resources
Policy, Planning and Training Division
Workforce Planning Branch
1200 Pennsylvania Avenue, N.W.
Room 1419 WJC East MC-3600A
Washington, D.C. 20460
Office: (202) 564-7419
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boxton.troy@epa.gov

OFFICE OF WASTEWATER MANAGEMENT
WATER PERMITS DIVISION
CURRENT ORGANIZATIONAL CHART



OFFICE OF WASTEWATER MANAGEMENT
WATER PERMITS DIVISION
Proposed **ORGANIZATIONAL CHART**



STAFFING PLAN CROSSWALK FORM: WPD/OWM/OW

PROPOSED: Immediate Office - JAA0000 (same org title and org code)

(A) Current Org Code	(B) Current Acronym	(C) Employee Name	(D) Current Position Title/Series/Grade	(E) Proposed Position Title/Series/Grade (If Changed)	(F) Empl ID	(G) Realign (L)/Reassign (R)/No Change (NC)	(H) Notes
JAA0000	IO	Deborah Nagle	Director, Water Permits Division, ES-0340-00		0024763	NC	
JAA0000	IO	Brian Frazer	Supervisory EPS, GS-0028-15	EPS, GS-0028-15	004472	R	Change to nonsupervisory position; new PD, PD coversheet, checklist; abolish supervisory EPS PD
JAA0000	IO	Rob Powell	Program Analyst, GS-0343-14		0067249	NC	
JAA0000	IO	Tangela Cooper	Program Analyst, GS-0343-14		006425	NC	

PROPOSED: Municipal Branch JAAA-0000 (same org title and org code)

(A) Current Org Code	(B) Current Acronym	(C) Employee Name	(D) Current Position Title/Series/Grade	(E) Proposed Position Title/Series/Grade (If Changed)	(F) Empl ID	(G) Realign (L)/Reassign (R)/No Change (NC)	(H) Notes
JAAA0000	MB	Chris Kloss	Supervisory EPS, GS-0028-15	Supervisory Physical Scientist/Environmental Engineer, GS-1301/0819-15	31991	R	New PD, PD coversheet, checklist, transcripts, resume
JAAA0000	MB	Katelyn Amraen	Physical Scientist, GS-1301-11		2333295	NC	
JAAA0000	MB	Lisa Biddle	Environmental Engineer, GS-0819-13		32187	NC	
JAAA0000	MB	Mohammed Billah	Environmental Engineer, GS-0819-13	Environmental Engineer, GS-0819-13	24469	R	PD > 5 years
JAAA0000	MB	Debora Clovis	Attorney-Advisor, GS 0905-14	Attorney-Advisor, GS 0905-14	16426	R	PD > 5 years
JAAA0000	MB	Holly Galavotti	EPS, GS-0028-13	EPS, GS-0028-13	24041	R	PD > 5 years
JAAA0000	MB	Emily Halter	Economist, GS-0110-11		2333113	NC	
JAAA0000	MB	Jenelle Hill	EPS, GS-0028-12		32009	NC	
JAAA0000	MB	Matt King	EPS, GS-0028-13		29894	NC	
JAAA0000	MB	Jamie Piziali	EPS (Lead), GS-0028-14		26573	NC	
JAAA0000	MB	Bryan Rittenhouse	Physical Scientist, GS-1301-13	Physical Scientist, GS-1301-13	5687	R	PD > 5 years
JAAA0000	MB	Greg Schaner	Attorney-Advisor, GS-0905-14	Attorney-Advisor, GS-0905-14	21850	R	PD > 5 years
JAAA0000	MB	Mary Wigginton	EPS, GS-0028-13		16534	NC	
JAAA0000	MB	Rachel Urban	EPS, GS-0028-14		25327	NC	
JAAA0000	MB	Kevin Weiss	Chemical Engineer, GS-0893-15	Chemical Engineer, GS-0819-15	6316	R	PD > 5 years

PROPOSED: Industrial Branch - JAAB0000 (same org title and org code)

(A) Current Org Code	(B) Current Acronym	(C) Employee Name	(D) Current Position Title/Series/Grade	(E) Proposed Position Title/Series/Grade (If Changed)	(F) Empl ID	(G) Realign (L)/Reassign (R)/No Change (NC)	(H) Notes
JAAB0000	IB	Marcus Zobrist	Supervisory EPS, GS-0028-15	Supervisory Physical Scientist/Environmental Engineer, GS-1301/0819-15	0061580	R	New PD, PD coversheet, checklist, transcripts, resume
JAAC0000	RB	Nina Bonnelycke	EPS, GS-0028-13	EPS, GS-0028-13	001082	R	new org code; PD > 5 years
JAAC0000	RB	Jennifer Chan	Environmental Engineer, GS-0819-13	Environmental Engineer, GS-0819-13	0001783	R	new org code; PD > 5 years
JAAC0000	RB	Prasad Chumble	Physical Scientist, GS-1301-13	Physical Scientist, GS-1301-13	0074841	R	new org code; PD > 5 years
JAAC0000	RB	Jenny Molloy	Environmental Engineer, GS-0819-14	Environmental Engineer, GS-0819-14	0041893	R	new org code; PD > 5 years
JAAC0000	RB	Hema Subramanian	EPS, GS-0028-13	EPS, GS-0028-13	0070530	R	new org code; PD > 5 years
JAAC0000	RB	George Utting	Environmental Scientist, GS-1301-15	Physical Scientist, GS-1301-15	0026086	R	new org code; PD > 5 years
JAAC0000	RB	Joseph Ziobro	Physical Scientist, GS-1301-11		2333229	L	new org code
JAAD0000	SRB	Laura Phillips	Biologist, GS-0401-13	Biologist, GS-0401-13	0002847	R	new org code; PD > 5 years
JAAB0000	IB	Rebecca Christopher	Biologist, GS-0401-12		32880	NC	
JAAB0000	IB	Jack Faulk	EPS, GS-0028-14	EPS, GS-0028-14	0073925	R	PD > 5 years
JAAB0000	IB	Jan Pickrel	EPS, GS-0028-14	EPS, GS-0028-14	0050662	R	PD > 5 years

JAAB0000	IB	Juhi Saxena	Attorney-Advisor, GS-0905-14	Attorney-Advisor, GS-0905-14	0002339	R	PD > 5 years
JAAB0000	IB	Scott Wilson	Physical Scientist, GS-1301-14	Physical Scientist, GS-1301-14	0059413	R	PD > 5 years
JAAB0000	IB	Sean Ramach	Physical Scientist, GS-1301-13		24882	NC	
JAAB0000	IB	Kathryn Kazior	Environmental Engineer, GS-0819-11		26849	NC	

PROPOSED: National Program Branch (new org title and same org code)

(A) Current Org Code	(B) Current Acronym	(C) Employee Name	(D) Current Position Title/Series/Grade	(E) Proposed Position Title/Series/Grade (If Changed)	(F) Empl ID	(G) Realign (L)/Reassign (R)/No Change (NC)	(H) Notes
JAAD0000	SRB	Vacant	Supervisory EPS, GS-0028-15	Supervisory Physical Scientist/Environmental Engineer, GS-1301/0819-15			New PD, PD coversheet, checklist; Recruit
JAAD0000	SRB	Sarah Hoyt	Lead EPS, GS-0028-14	EPS, GS-0028-14	0020946	R	PD > 5 years
JAAD0000	SRB	Ginny Kibler	EPS, GS-0028-14	EPS, GS-0028-14	0075578	R	PD > 5 years
JAAD0000	SRB	Nizanna Bathersfield	Attorney-Advisor, GS-0901-14		0038892	NC	
JAAD0000	SRB	Jackie Clark	Physical Scientist, GS-1301-13	Physical Scientist, GS-1301-13	0062542	R	PD > 5 years
JAAD0000	SRB	Dave Hair	Environmental Engineer, GS-0819-14	Environmental Engineer, GS-0819-14	0051241	R	PD > 5 years
JAAD0000	SRB	Gary Hudiburgh	Attorney-Advisor, GS-0901-15		0063512	R	PD > 5 years
JAAD0000	SRB	Erin Flannery Keith	Attorney-Advisor, GS-0901-13		0068094	NC	
JAAD0000	SRB	Beth Ragnauth	Information Management Specialist, GS-0301-13	Information Management Specialist, GS-0301-13	0058595	R	PD > 5 years
JAAD0000	SRB	Janita Aguirre	Physical Scientist, GS-1301-13		24769	NC	
JAAD0000	SRB	Francis Sylvester	Physical Scientist, GS-1301-11		02334543	NC	
JAAD0000	SRB	Sharmin Syed	EPS, GS-0028-13	EPS, GS-0028-13	0027938	R	PD > 5 years
JAAD0000	SRB	Danielle Stephan	EPS, GS-0028-13	EPS, GS-0028-13	0038652	R	PD > 5 years
JAAD0000	SRB	Amelia Letnes	EPS, GS-0028-13	EPS, GS-0028-13	0047822	R	PD > 5 years
JAAD0000	SRB	Ross Brennan	Supervisory EPS, GS-0028-15	EPS, GS-0028-15	3851	R	New PD, PD coversheet, checklist; abolish supervisory EPS PD

Current Functional Statement

WATER PERMITS DIVISION. The Water Permits Division, under the supervision of a Director: provides national program direction to the National Pollutant Discharge Elimination System (NPDES) permit, pretreatment, and sewage sludge management programs under sections 401, 402, and 405 of the Clean Water Act, including: development of regulations, policy and guidance, development of national strategies, implementation management, compliance assurance and overview of regional and State operation; develops and coordinates regulations, national policy, priorities and strategies for developing, approving, implementing, modifying and overseeing state NPDES, pretreatment, and sludge management programs; reviews State applications for administration of the NPDES, pretreatment, and sludge management programs and major modifications to approved State programs; provides program direction to the national pretreatment program including local pretreatment program development, review, and implementation; reviews and redesigns the NPDES, pretreatment, and sludge management programs to be responsive to statutory and court ordered mandates and changes in Agency policy; develops model approaches for management of the NPDES program which consider changes in national priorities (such as water quality-based controls and the watershed approach); and develops new and unique policies, methods, procedures, or types of permits for controlling combined sewer overflows, sanitary sewer overflows, run-off of storm water from industry, commerce and cities, confined animal feedlots, mines, and other water pollution sources.

The Division also coordinates with the Office of Science and Technology (OST) in the development of national standards for point source controls, indirect dischargers, and sludge use and disposal which are implemented through the NPDES, pretreatment and sludge management programs; provides technical support and training to regions and states for all aspects of the NPDES permit, pretreatment, and sludge management programs; oversees regional and State performance in implementing the NPDES permit, pretreatment, and sludge management programs; develops and coordinates national NPDES policy, priorities and strategies and regulatory changes necessary to reflect the RCRA and CERCLA responsibilities of the Office of Water; works closely with the ORD to develop, implement and monitor research and development support for NPDES permit, sludge management and pretreatment activities, in cooperation with OST; develops and revises NPDES permit application forms.

The Immediate Office of the Director determines national policy, management direction, and coordination of the NPDES Permit Program under the Clean Water Act. The Office manages the operational and administrative functions of the Division. Responsible for managing both internal and external communications within the Division and Headquarters and with regions, States, and the public/customers/interest groups through various mechanisms including the NPDES Policy Compendium and the OWM home page. Coordinates congressional affairs and legislative issues involving CWA amendment proposals and other environmental legislation, including analyses and preparation of issue papers, briefing documents and testimony. Directs Division strategic planning to incorporate Government Performance and Results Act (GPRA) objectives, Office of Water National Program guidance, and other environmental performance and accountability initiatives such as the Clean Water Action Plan. Maintains accountability through operating plan for Division. Coordinates overall Division activities in areas of reinvention, enforcement, regulation management, and ICR development. Directs Division administration of resources and

internal operating policies and procedures including records management and human resources development and management. Responsible for development and management of Division budgets. Oversees contract and grant activities including division acquisition strategy, procurement process, submission of grant proposals, and contract and grant administration.

http://intranet.epa.gov/ohr/programs/functional/OW_fs.pdf

WATER PERMITS DIVISION FUNCTIONAL STATEMENT - PROPOSED

The Water Permits Division (WPD) provides national program direction to the National Pollutant Discharge Elimination System (NPDES) permit, pretreatment, and sewage sludge management programs under Sections 401, 402, and 405 of the Clean Water Act.

WPD works with:

- The Office of Science and Technology (OST) in the development of national technology standards, water quality criteria development and water quality standards
- The Office of Wetlands, Oceans and Watersheds (OWOW) on Total Maximum Daily Load (TMDL) implementation, nonpoint source programs and analysis of monitoring data
- The Office of General Counsel (OGC) to track and respond to litigation regarding NPDES rules and permits, and in the promulgation of regulations
- The Office of Enforcement and Compliance Assurance (OECA) on electronic reporting systems for NPDES permits and NPDES permit compliance issues
- The Office of Research and Development (ORD) on research and development support for NPDES permit and pretreatment activities
- Other Federal agencies on related permit programs and other Federal laws and Executive Orders
- States and Territories on the development, authorization and implementation of NPDES programs

The WPD consists of an immediate office and three branches:

The Immediate Office of the Director. The Immediate Office (IO) manages the operational and administrative functions of the Permits Division including:

- Internal and external communications within EPA and with interested stakeholders
- Strategic planning including Government Performance and Results Act (GPRA), Office of Water National Program guidance, and other environmental performance and accountability tools
- Financial oversight and accountability of allocated resources
- Contract and grant activities including the division acquisition strategy, procurement process, submission of grant proposals, and contract and grant administration
- Records management
- FOIA responses

THE MUNICIPAL BRANCH. The Municipal Branch is responsible for:

- Developing and implementing national programs, regulations and policies related to wet weather
- Establishing the national direction and overseeing the National Combined Sewer

- Overflow (CSO) Policy, Sanitary Sewer Overflow requirements, stormwater requirements related to municipal separate storm sewer systems (MS4s), and stormwater discharges from construction and industrial facilities activities
- Providing technical support in developing EPA's Multi-Sector General Permit (MSGP) and Construction General Permit (CGP) for stormwater and industrial discharges
- Working with states and regions to issue NPDES permits to MS4s
- Fostering green infrastructure and providing technical assistance and other information to communities related to green infrastructure and long-term stormwater planning
- Encouraging integrated planning for municipalities with multiple Clean Water Act requirements
- Evaluating cross-media impacts affecting municipalities, (e.g. air and RCRA sources)
- Providing training and technical guidance to interested stakeholders
- Developing policy regarding water quality impacts of forest roads on private and federal lands, including coordination with the US Forest Service and the Bureau of Land Management
- Promoting watershed approaches by municipal entities to implement municipal-oriented TMDLs

THE INDUSTRIAL BRANCH. The Industrial Branch is responsible for:

- Developing and implementing the industrial technology-based permitting program, cooling water intake structures regulations, industrial multi-media issues, and the pretreatment program
- Providing guidance and assistance to EPA Regions and NPDES authorized states for interpreting effluent limitation guidelines, regulations and establishing limitations on a case-by-case basis in the absence of regulations for specific pollutants
- Providing national direction and technical assistance to EPA Regions and NPDES authorized states on permit issuance for onshore and offshore oil and gas facilities (including facilities using fracking) and for mountaintop coal mining
- Developing and coordinating in cooperation with other federal agencies and states, overall national policies, priorities and strategies to address pollution from hard rock, coal mining, and re-mining activities
- Coordinating with the Department of Interior on the Surface Mining Control and Reclamation Act activities
- Overseeing regulations for variances from technology based requirements
- Coordinating with OST on the development and implementation of effluent limitation guidelines
- Developing and issuing general permits for discharges from vessels, pesticide applications, stormwater discharges from industrial and construction activities

- Developing and implementing national policy, priorities, and strategies for establishing, implementing, upgrading, and overseeing local pretreatment programs
- Developing and implementing national programs and policies relating to rural point sources including permitting programs and strategies for animal feeding operations
- Providing liaison with federal, state, interstate, and local agencies in the formulation of policy, procedures, priorities for the implementation of the CAFO NPDES rule and other issues associated with agriculture.
- Working with states and regions to issue NPDES permits to CAFOs
- Coordinating with nonpoint source programs on Animal Agriculture controls

THE NATIONAL PROGRAM BRANCH. The National Program Branch is responsible for:

- Developing and interpreting the NPDES regulations, policies and program implementation guidance, overall oversight of regional and state NPDES permit programs, and state and Tribal Program authorization
- Developing any necessary changes to the NPDES permit regulations and state programs including changes necessary to implement water quality standards, streamlining the permit process, implementation of electronic reporting, and effluent monitoring burden reduction.
- Tracking of administrative appeals of NPDES permits and EPA objections to state issued permits
- Providing support and regulatory interpretation on all NPDES permit regulation issues
- Providing basic and advanced NPDES training for permit writers, permit holders, and other key stakeholders
- Reviewing and recommending actions, in conjunction with the OGC and OECA, on state applications to administer the NPDES permit program or to modify approved state NPDES programs, and on petitions to withdraw state programs
- Reviewing treatment as a state applications from Indian Tribes for NPDES permit program
- Coordinating with other OW offices on TMDL program development and implementation, watershed management, discharges to near coastal and marine waters, water quality standards development and implementation, and exposure analyses
- Assessing how to implement the NPDES program on a watershed basis, including development of watershed permit
- Developing technical guidance and policy for water quality-based permitting

EPA ORGANIZATION CODE CHANGE REQUEST FORM

(11/2015 Edition)

Proposed Effective Date:

REGION/AASHIP: OW/OWM/WPD

Instructions: Please complete the Organization code change form and forward it as part of the final reorganization package (without the examples). All requested changes will be reviewed by the agency's reorganization team for conformity with system code change procedures. Failure to provide this information may delay processing of this request. There must be **one line** for each Type of Change. Deleted organizations will be inactivated and the Current Organization Name and Organization Code needs to be provided. New organizations start at Type of Change with "New Organization" and fill in the rest to the right. Please provide the City and State, "Duty Location" of the new organization. When Renaming organizations, if it changes in the organizational level then that organization can not be changed. It needs to be listed as a Delete and a New Organization created with the new name. Renamings stay at the same level in the organization hierarchy.

[illegible]